

Exhibit D

DECLARATION OF DAVID BRODY

I, David Brody, declare as follows:

1. My name is David Brody. I am over 18 years old. The information in this declaration is based on my personal knowledge.
2. I reside in Washington, D.C., United States of America.
3. I am lawyer.
4. The Electronic Privacy Information Center (EPIC) is a non-profit, public interest research center established in 1994 to focus public attention on emerging privacy and civil liberties issues. Central to EPIC's mission is oversight of government activities that impact individual privacy, free expression, and democratic values.
5. I am a member of EPIC because I contribute to the advancement of the mission of EPIC and have been recognized and registered as a member by EPIC by virtue of paying dues since at least 2016.
6. I am also a member of the EPIC Advisory Board, which is composed of distinguished experts in law, technology, and public policy. I joined the EPIC Advisory Board in 2022.
7. As a member of EPIC and the EPIC Advisory Board, I participate in the activities of EPIC, help finance the activities of EPIC, and provide leadership for EPIC. I also pay membership dues, as required by the amended EPIC bylaws.
8. I became an EPIC member because I am concerned about protecting privacy, freedom of expression, and democratic values in the information age. As a public interest lawyer focused on privacy and civil rights, EPIC's work on these issues is of special importance to me.
9. I have electronically filed a federal income tax return within the last six years.
10. I have also received a federal tax refund via direct deposit within the last six years.

11. Because I have electronically filed a federal information tax return and received a federal tax refund within the last six years, I understand that my personal information, including my Social Security number and banking information, among other sensitive information, is stored in the payment systems of the U.S. Department of Treasury's Bureau of the Fiscal Service (BFS).
12. Based on confidence in government security practices and explicit disclosures, such as the Taxpayer Bill of Rights, I understood and expected that the federal government would keep my personal information contained in BFS payment systems private and confidential.
13. I understood and expected that the federal government would adhere to all applicable laws, regulations, and policies protecting the privacy, confidentiality, and security of my personal information contained in BFS payment systems.
14. The unlawful breach, disclosure, and accessing of my personal information contained in BFS payment systems has caused me, and continues to cause me, significant fear about the misuse of my information by those who have accessed it, significant fear about the increased vulnerability of my personal information to further theft, and significant fear about the increased risk of identity theft.
15. The unlawful breach, disclosure, and accessing of my personal information, the violation of my privacy rights, and the unsafe manner in which defendants are handling my personal information have caused me anxiety about the security of my personal financial information.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Executed on February 11, 2025

A handwritten signature in black ink, appearing to read 'David Brody', positioned above a horizontal line.

David Brody